

The C. M. Paula Company

RICHARD F. DICKERSON
PRESIDENT

September 20, 1991

EPA Region 5 Records Ctr.



275033

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul J. Rogers
Superfund Program Management Branch
5 HSM TUB-7
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Re: Request for Information pursuant to §104(e) of
CERCLA and §3007 of RCRA, for the Skinner Landfill,
West Chester, Ohio (the "Site")

Dear Mr. Rogers:

This letter is in response to the §104 Information Request issued to the C. M. Paula Co. (the "Company") which was received by the Company on July 25, 1991. In a telephone conversation with our counsel on August 21, 1991, you granted the Company an extension until September 27, 1991 in which to respond to the Information Request.

At the outset, it should be noted that the Company denies that it directly or indirectly arranged for the transport, storage, treatment or disposal of any hazardous materials at the Site. Further, the Company objects to the extent the Information Request asks for documents or information that are privileged. Subject to the foregoing reservations, the Company's responses to the Information Request are as follows (Please note that each answer corresponds with the request numbers set forth in your letter and we have not restated your questions):

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of liquid waste to Ecolotec, Inc., a permitted disposal facility in Dayton, Ohio. The materials disposed of were characterized as hazardous because of potential contact with methylene chloride used in the cleaning of molding and other equipment. As indicated in the enclosed waste product survey forms prepared by Ecolotec, Inc., the methylene chloride was in concentrations of 0-10%, with the balance of the waste material consisting of non-hazardous materials such as WEP and paper waste. It is important to note that all of the accumulated waste material disposed of in 1988 was not necessarily hazardous waste. Tencon, Inc. made the determination that it would be more cost effective to treat each drum as hazardous waste rather than conducting laboratory testing to positively determine that all waste was hazardous. None of the accumulated waste disposed of by the Company in 1988 was sent to the Site.

8. The Company contracted with Clarke Trash Removal Company in approximately 1972 to haul all waste materials generated by the Company. BFI Industries subsequently took over the trash removal services performed by Clarke in the late 1970s. The Company's current contract for trash removal is with Rumpke. The Company does not have any information to show that any waste handled by such waste disposal firms was ever sent to the Site.

9. (a) Not applicable. It is not appropriate for the Company to provide financial information at this time because there is no evidence to show that the Company arranged for the transport, storage, treatment or disposal of hazardous materials at the Site.

(b) The Company does not have any subsidiaries.

(c) The Company has not had any changes in its corporate name, ownership or structure, and has not obtained an interest in or dissolved itself of an interest in any other corporation, subsidiary, division or other entity.

The foregoing information provided by the Company is the result of a diligent search of reasonably available corporate records and interviews with past and present Company employees. The responses to the Information Request are, to the best of my knowledge, truthful and believed to be complete. The right to supplement this response if additional information is discovered is specifically reserved.

In addition, please consider this letter a request pursuant to the Freedom of Information Act to provide our counsel, Daniel P. Utt, Katz, Teller, Brant & Hild, 2400 Chemed Center,

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